

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:

AREU STUDIOS, LLC,

Debtor.

CHAPTER 11

CASE NO. 20-71228-PMB

SECOND MOTION REQUESTING CONTINUANCE OF CONFIRMATION HEARING

COMES NOW Areu Studios, LLC (“Debtor”), by and through the undersigned counsel and hereby files this “Second Motion Requesting Continuance of Confirmation Hearing” (“Motion”). In support of the Motion, Debtor respectfully shows the Court as follows:

1. On October 29, 2020 (the “Petition Date”), Debtor commenced this voluntary case (the “Case”) by the filing of petition for relief under Chapter 11 of the Bankruptcy Code.
2. On December 11, 2020, Debtor filed its “Amended Disclosure Statement for Plan of Reorganization” (Doc. No. 43) and “Amended Plan of Reorganization” (Doc. No. 44) (the “Plan”).
3. On December 15, 2020, the Court entered an “Order and Notice (A) Conditionally Approving Debtor’s Disclosure Statement for Plan of Reorganization, (B) Establishing Balloting and Objection Deadlines, and (C) Scheduling Confirmation and Final Hearing on Disclosure Statement” (Doc. No. 47) setting the deadline for objections to the Plan and deadline for casting ballots regarding the Plan as January 15, 2021 and scheduling confirmation for January 19, 2021.
4. On January 11, 2021, Debtor filed its “Motion Requesting Continuance of Confirmation Hearing” (Doc. No. 55).
5. On January 14, 2021, the Court entered an “Order and Notice Rescheduling Webex Hearing and Extending Ballot and Objection Deadlines” (Doc No. 57) setting the

deadline for objections to the Plan and deadline for casting ballots regarding the Plan as February 18, 2021 and scheduling confirmation for February 23, 2021.

6. On February 5, 2021, Debtor filed its “Second Amended Plan of Reorganization” (Doc. No. 71).

7. Debtor requires additional time to resolve objections and discuss the Plan with creditors.

8. Debtor requests the continuance of the ballot and objection deadlines through and including March 10, 2021 and continuance of the Confirmation Hearing to a specially set hearing on or about March 12, 2021 in order to allow for continued discussions regarding the Plan.

WHEREFORE, Debtor requests that the Court enter an order granting this Motion and continuing the balloting and objection deadlines and the confirmation hearing to a date certain, and granting such other and further relief as is deemed just and proper.

This 15th day of February, 2021.

JONES & WALDEN LLC

/s/ Cameron M. McCord

Cameron M. McCord

Georgia Bar No. 143065

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, the foregoing Motion was electronically filed using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Motion to the following parties who have appeared in these cases under the Bankruptcy Court's Electronic Case Filing Program:

- **Matthew R. Brooks** matthew.brooks@troutmansanders.com
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- **Thomas R. Walker** thomas.walker@fisherbroyles.com

This 15th day of February, 2021.

JONES & WALDEN LLC

/s/ Cameron M. McCord

Cameron M. McCord

Georgia Bar No. 143065

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